

Building Brighter Futures with Children and Families



March 13, 2015

Portland Planning and Sustainability Commission
c/o Ms. Marty Stockton, Southeast District Liaison
Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7000
Portland, Oregon 97201

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PLANNING BUREAU
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Dear Chair Baugh and Fellow Commissioners:

A non-profit agency with roots dating back to 1867, Trillium Family Services (TFS) is Oregon's largest provider of mental and behavioral healthcare for children and families. The agency's Portland headquarters is located at the Parry Center, 3415 SE Powell Boulevard, which has provided services to the community at this location continuously since 1926. Through both its 45 residential beds dedicated to intensive on-site inpatient services and the availability of a full continuum of wrap-around outpatient services, the campus provided support to over 1100 Metro-area clients ages 5-18 years in 2014. Roughly 75% of the families that we serve are low-income and, therefore, are either insured under the Oregon Health Plan and/or receive subsidized care. As a result, TFS provides substantial community benefits.

The purpose of this letter is to request specific Comprehensive Plan and Zoning designations for the Parry Center in the final Comprehensive Plan Map that the Bureau of Planning and Sustainability will be submitting for your review this summer. Attached is our rationale for requesting a unified Comprehensive Plan designation, either Mixed-Use/Civic Corridor (MU-CC) or Mixed-Use/Urban Center (MU-UC), and Zoning designation of either CM2 or CM2/CM3 for our site. Otherwise, the currently-proposed zoning, a combination of R1 and CM2/CM3, will perpetuate the current split-zoning situation to our agency's detriment.

This is a particularly timely issue as the agency initiates the planning process for a new 20-year facilities plan to improve facilities for residential patients and expand outpatient, outreach and collaborative activities with other social service and medical providers.

Thank you for your consideration of this important concern to TFS.

Sincerely,

JB Allbritton, Chief Financial Officer
ballbritton@trilliumfamily.org

www.trilliumfamily.org

Parry Center for Children & Waverly Children's Programs
3415 SE Powell Boulevard
Portland, Oregon 97202
T 503-234-9591
F 503-205-0188

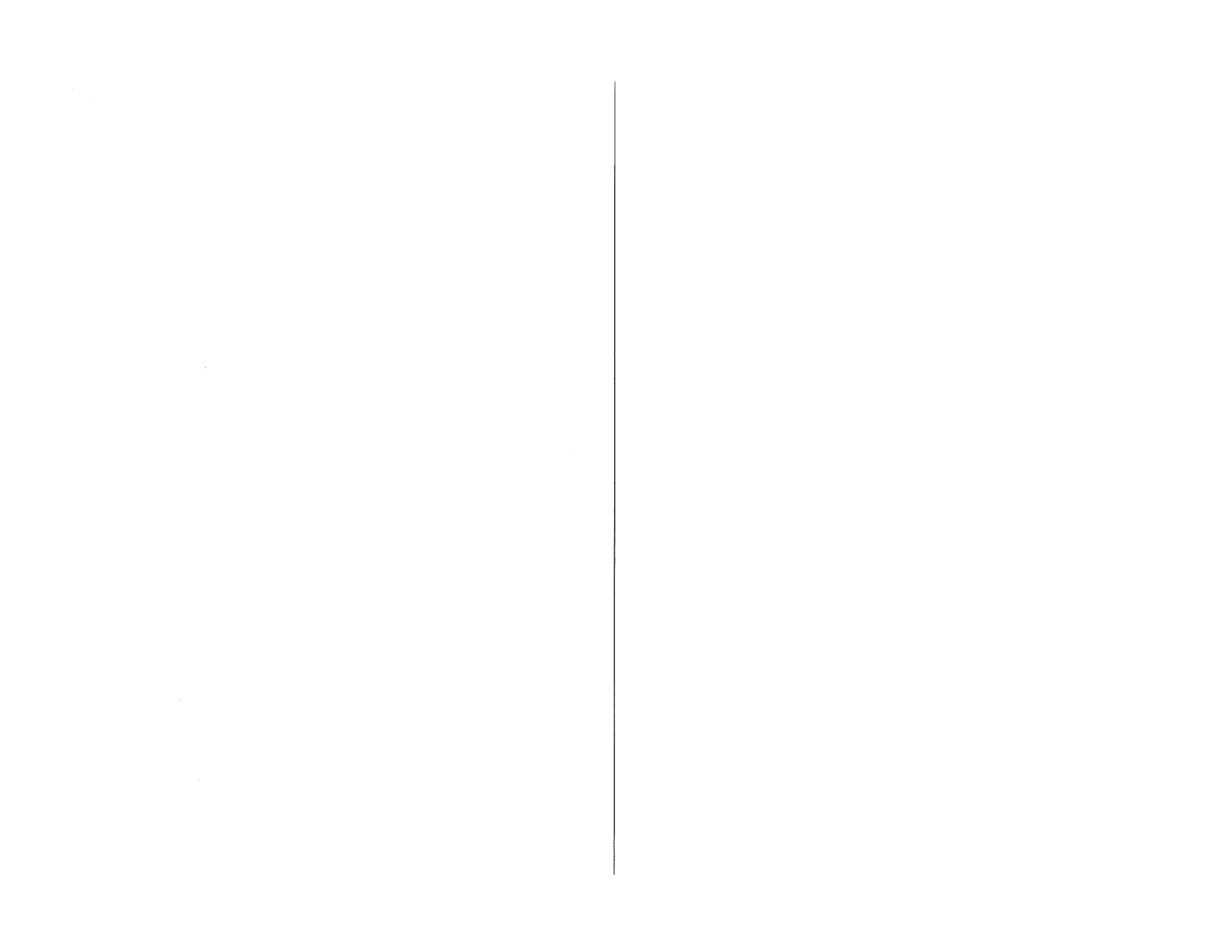
Children's Farm Home
4455 NE Highway 20
Corvallis, Oregon 97330
T 541-757-1852
F 541-750-1120

Edwards School Day Program
1715 SE 32nd Place
Portland, Oregon 97214
T 503-983-4920
F 503-445-0802

Sender House Young Adult Program
729 SW 7th Avenue
Albany, Oregon 97322
T 541-928-1757
F 541-928-8538

Wake Robin School Day Program
1520 Plaza St. NW, Ste 100
Salem, Oregon 97304
T 503-385-8409
F 971-273-7486





PORTLAND COMPREHENSIVE PLAN
WRITTEN TESTIMONY FOR TRILLIUM FAMILY SERVICES/PARRY CENTER

Applicant: JB Allbritton, Chief Financial Officer
Trillium Family Services
3415 SE Powell Boulevard
Portland, Oregon 97202
503.205.3548
ballbritton@trilliumfamily.org

Planner: Beverly Bookin, AICP
The Bookin Group, LLC
813 SW Alder Street, Suite 320
Portland, Oregon 97205
503.241.2423
bookin@bookinggroup.com

Use: A non-profit social services agency operated by Trillium Family Services (TFS), the Parry Center provides comprehensive inpatient/outpatient mental health services for children, 5-18 years. The inpatient housing component is considered a **Group Living** use and the outpatient services, outreach and administrative functions as a **Community Service** use, according to the Use Classifications in Chapter 33.920 of the Portland Zoning Code.

Address: 3415 SE Powell Boulevard

Site Size: 11.9 acres

Legal Description: 1S1E12AC 5600

Existing Zoning: R1/R1 (CG), the latter on the southern 1/3 of the property (Figure I).

Current Proposed Comprehensive Plan Designation: As illustrated on Figure 1:

Southern Portion: Comp Plan: MU/CC or MU-UC; **Zoning Designation:** CM2 or CM3

Northern Portion: Comp Plan/Zoning Designation: No change

Land Use Status: Both Group Living and Community Services uses are Conditional Uses in the R1 zone. Parry Center has operated the last 20 years under a 1995 Conditional Use Master Plan (CUMP) (LU 95-00097 CUMS). Having recently completed a new Strategic Plan, TFS is about to begin the development of a new 20-Year Master Facilities Plan. The latter includes expanding the core program and considering community service/office and retail activities with partnering agencies.

Request: That Bureau of Planning and Sustainability (BPS) consider adopting:

- **Comprehensive Plan** designation for the entire site of either Mixed-Use/Civic Corridor (MU-CC) or Mixed-Use/Urban Center (MU-UC), based on the decision for the Powell Boulevard Corridor as a whole;
- **Zoning** designation for the entire site of either Commercial Mixed-Use (CM2) or a combination of MC2/MC3. TFS is opposed to the designation of the site for Commercial Employment (CE).

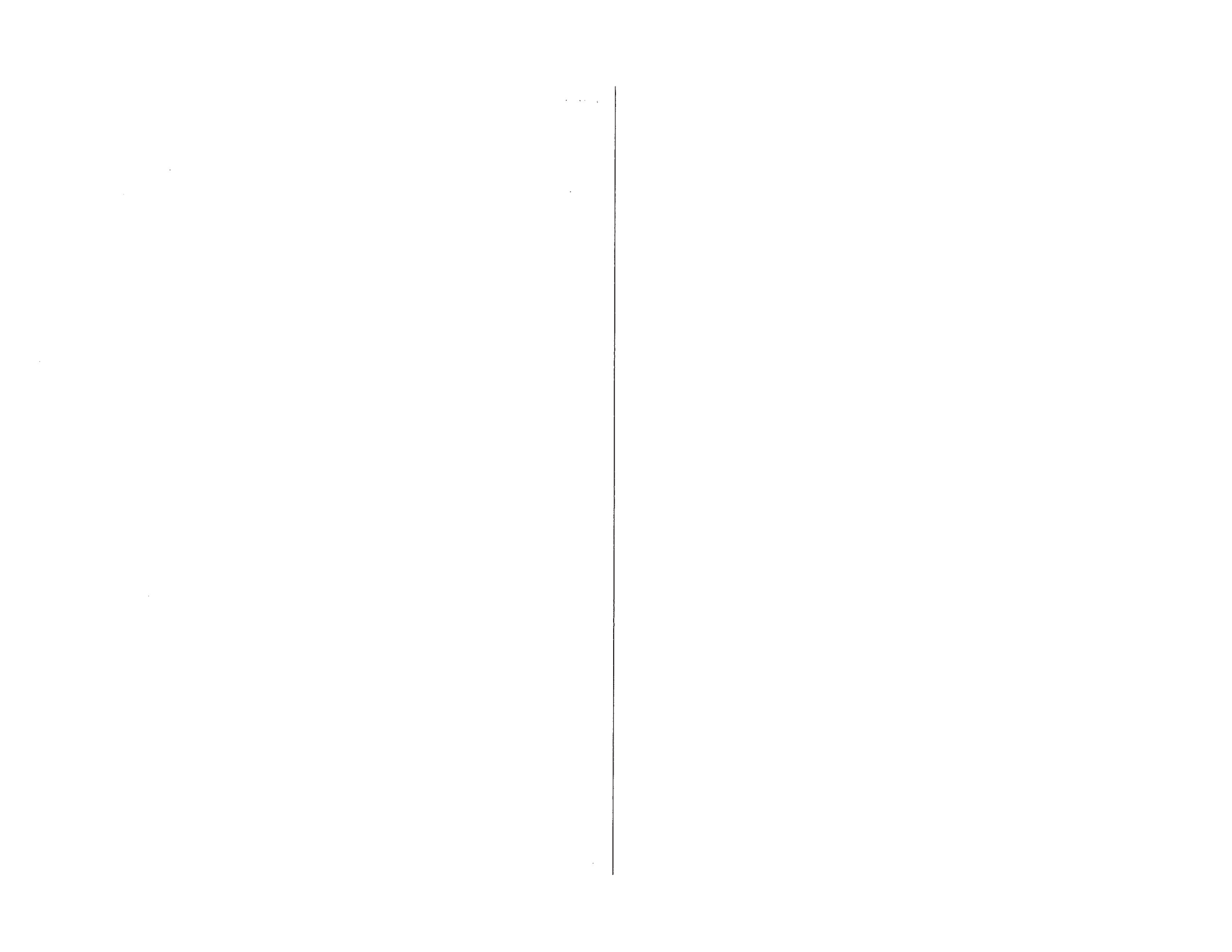
Supporting Arguments

1. **Split-zoning is bad land use practice.** The new Comprehensive Plan should address current split-zoning situations such as is the case at this site, not perpetuate the problem. It is TFS's understanding that BPS intends to address the split-zoning issue on hundreds of properties as part of the Comprehensive Plan Update.
2. **Comprehensive Plan/Zoning Decisions should recognize the existing underlying development pattern.** The Parry Center has operated continuously at this location since 1926. Having merged into TFS in 1998, the agency intends to expand the use over time. The underlying premise of the current split-zoning situation was made in the early 1980s on the assumption that the site would redevelop and be partitioned. This is not the case, which should be taken into consideration in applying new Comprehensive Plan/Zoning designations.
3. **The current/proposed zoning boundary is arbitrary.** The current R1/R1 (CG) boundary is a straight-line extension of the CG/R1 boundary through the mid-line of the right-of-way immediately to the east without regard to the site's underlying topography or building inventory. As it happens, the line is actually drawn through several existing buildings (Figure 2). The proposed residential/commercial split-zoning will perpetuate this situation.
4. **Split-zoning is especially problematic for a Conditional Use.** Under Section 33.815.070 Sites with Split Zoning

When a proposed use is located on a site which has more than one zone, and the use is a conditional use in one zone and an allowed or limited use in the other, any proposals on the allowed site are subject to conditional use review.

Thus, even if the southern portion of the site is re-zoned to CM2 or CM3, where Group Living, Community Service, Retail and Office uses will be allowed by the right according to the CM Zones Concept (BPS, 11/5/13), the more restrictive R1 zoning on the northern the site will require CU review of any development anywhere on the site.

5. **The agency's programming ensures that the uses on the site will decline in scale and intensity toward the north, to protect existing neighbors.** It is Parry Center's intent to concentrate its outpatient, administrative and collaborative-partner activities on the southern portion of the site to provide necessary visibility and access from SE Powell Boulevard. On the other hand, children living on site need a quiet, safe, private and secure environment, which is perfect for the northern half of the site. Assuming existing group living facilities are rebuilt there, they will be low-rise and residential in character with associated school, playground/playing field and garden uses.
6. **The site's topography supports this geographic separation of uses** as the site is actually a hill (Figure 2), the top of which coincides with buildings in the center of the site and then slopes downward in all directions. The slope to SE Powell Boulevard is relatively steep, allowing opportunities to build some buildings and possibly structured parking in the slope. From the top of the hill, the site slopes downward, in some cases dramatically, to the northwest, north and east, which abuts single-family residential development. This places the site's neighbors below and at some distance from current and most future development and presents significant opportunities for successful screening.
7. **Full CM zoning for the whole site is not out of character with other SE Powell Boulevard landowners.** Both currently and as proposed, there is a significant depth of commercial zoning immediately to the south of SE Powell Boulevard. This includes a proposed CM2 or CM3 zoning designation that is as much as 330' deep. As illustrated in Figure 1, at its deepest point, the Parry Center site is 450' from SE Powell Boulevard to its back property line. Therefore, it is not such a stretch to re-zone the entire depth of the Parry Center site, especially since there is a high probability that the site will remain in single ownership for many years to come.
8. **The CM2/CM3 compromise.** If BPS proposes the more intense CM3 zoning for the SE Powell Boulevard Corridor, TFS would be willing to accept split CM3 zoning in the southern portion and CM2 zoning in the northern portion, using an east/west boundary slightly to the north of existing buildings as the new boundary. The lower development height/bulk standards, setback and screening requirements of the CM2 will provide ample buffer for neighboring properties, which, as described above, are significantly lower in grade. This two-zone solution does not engender the split-zoning problem created by Section 33.815.070, because Group Living and Community Service uses would be allowed in both CM zones. The zoning boundary would simply require that new development would be subject to different development standards depending where it is located on the site.



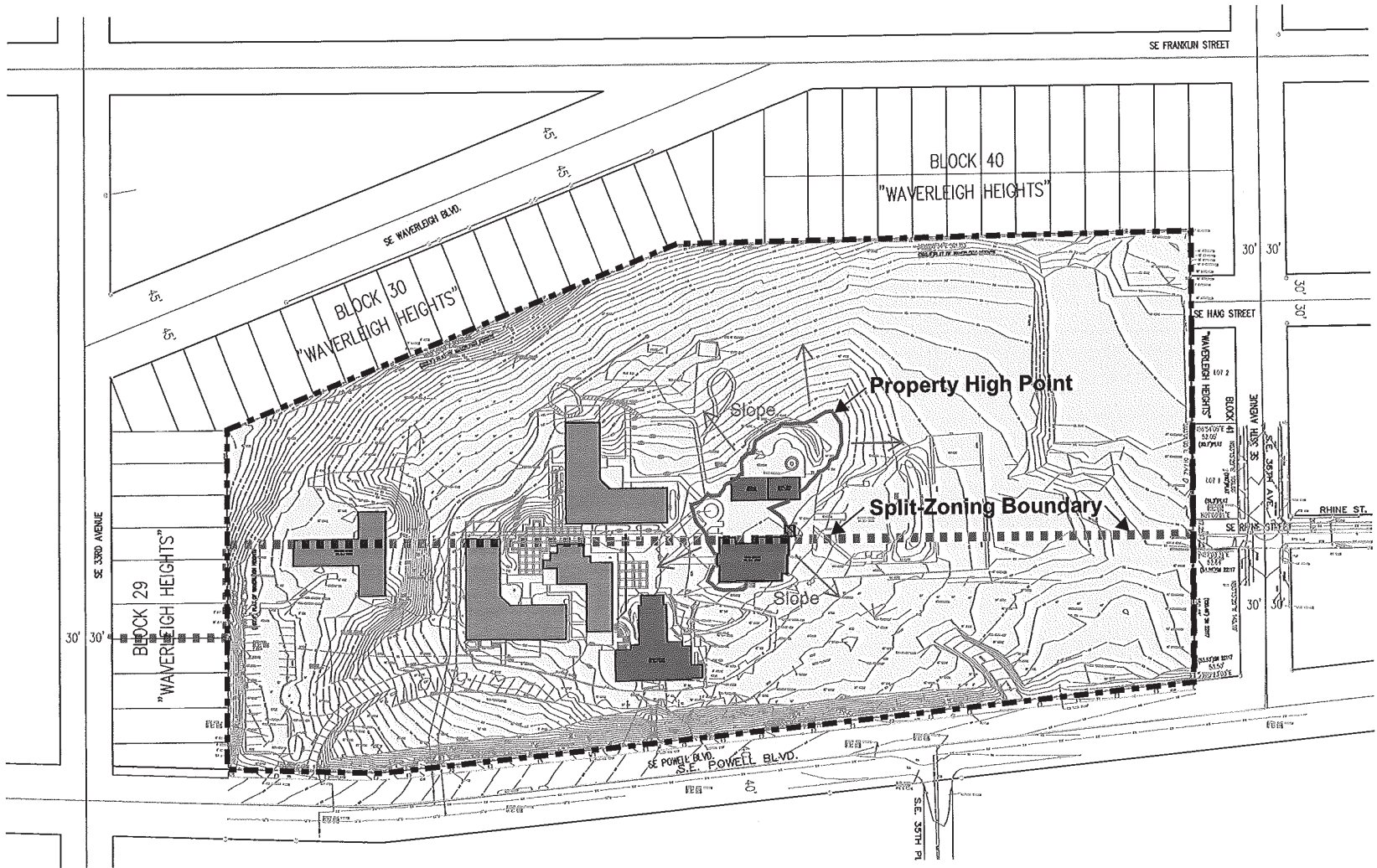
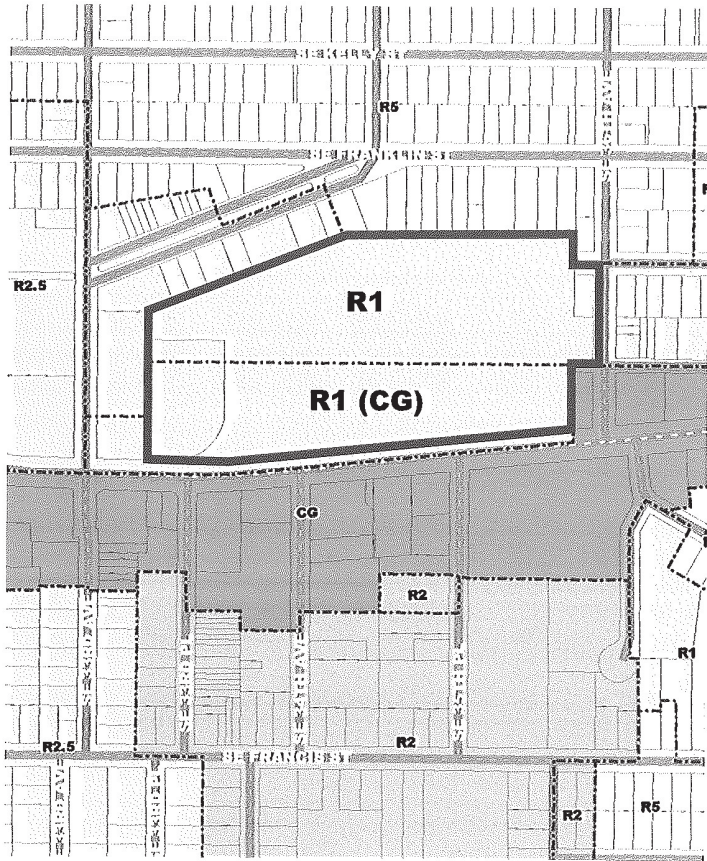


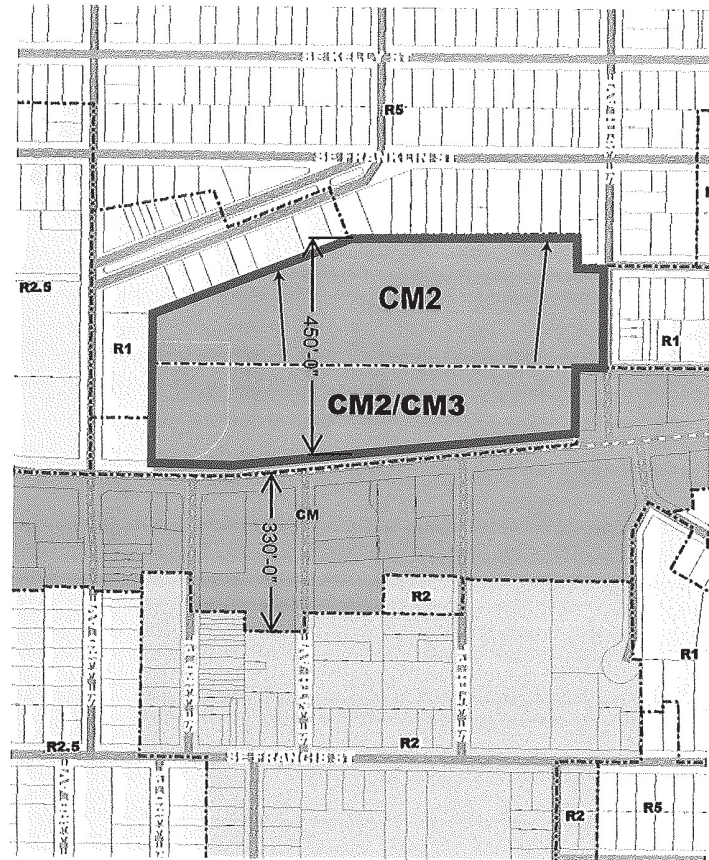
FIGURE -2
 IMPACT OF CURRENT/PROPOSED SPLIT-ZONING BOUNDARY
 Trillium Family Services I Parry Center
 3416 SE 36th Avenue Portland, OR



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EXISTING ZONING



PREFERRED PARRY CENTER ZONING

